

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

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Dana Albrecht,

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Plaintiff,

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v.

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Civil No. 1:23-CV-00381-JL-TSM

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Kathleen Sternenberg, *et al.*

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Defendants.

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**DEFENDANT JULIE A. INTROCASO’S MOTION TO EXTEND DEADLINES TO  
REPLY TO PLAINTIFF’S OBJECTION TO INTROCASO’S MOTION TO DISMISS**

Defendant Julie A. Introcaso, by and through counsel, the NH Office of the Attorney General, files this Motion to Extend Deadlines to Reply to Plaintiff’s Objection to Introcaso’s Motion to Dismiss, stating as follows:

1. Defendant Julie Introcaso filed a Motion to Dismiss on November 6, 2023, requesting that this Court dismiss Plaintiff’s Complaint in its entirety. ECF 18.

2. Plaintiff filed a motion requesting an extension of time to file his Objection to January 4, 2024. Plaintiff provided the following reasoning for his request: “due to the complexity of the subject matter in the pending Motions to Dismiss and accompanying Memorandums by the State Defendants.” ECF 22. Ms. Introcaso, through counsel, assented to Plaintiff’s request and this Court granted Plaintiff’s motion.

3. Plaintiff filed his Objection on January 8, 2024, without requesting leave of court to do so. ECF 27. Plaintiff’s Objection includes a 31-page memorandum and 27 exhibits, many of which were not included in the original Complaint.

4. Defendant Introcaso respectfully requests additional time to review the substantial number of filings by Plaintiff in order to determine whether a response is necessary. Ms. Introcaso requests until February 9, 2024 to file a reply.

5. Ms. Introcaso, through counsel, requested Plaintiff's assent to this extension, and Plaintiff did not assent.

WHEREFORE, Defendant Julie Introcaso respectfully requests that this Honorable Court:

- A. Grant this Motion to Extend;
- B. Extend the deadline to reply to Plaintiff's Objection to February 9, 2024; and
- C. Grant any further relief that justice may require.

Respectfully submitted,

Julie A. Introcaso

By her attorney,

JOHN M. FORMELLA  
ATTORNEY GENERAL

Dated: January 12, 2024

/s/ Catherine A. Denny  
Catherine Denny, NH Bar No. 275344  
Assistant Attorney General  
NH Department of Justice  
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Catherine.A.Denny@doj.nh.gov

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was sent by ECF on January 12, 2024 to the parties and/or counsel of record.

/s/ Catherine A. Denny  
Catherine A. Denny